

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., *et al.*,

Debtor.

Chapter 11

Case No. 20-12480 (LSS)

(Jointly Administered)

**Objection Deadline: April 25, 2025 at 4:00 ET**

**Hearing Date: May 6, 2025 at 11:30 ET**

**NOTICE OF MOTION OF JONATHAN ORTIZ MUNOZ AND  
HANNAH SHALOM MOODY FOR RETROACTIVE RELIEF FROM  
THE AUTOMATIC STAY AND, TO THE EXTENT APPLICABLE,  
THE PLAN INJUNCTION TO LIQUIDATE CLAIMS IN PENDING  
STATE COURT CIVIL CASES TO BE PRESENTED AT THE MAY 6,  
2025 HEARING**

**PLEASE TAKE NOTICE** that on April 11, 2025, Jonathan Ortiz Munoz and Hannah Shalom Moody filed the attached Motion for Retroactive Relief from the Automatic Stay and, to the Extent Applicable, the Plan Injunction to Liquidate Claims in Pending State Court Civil Cases (“**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). The Motion seeks the relief from the automatic stay.

**PLEASE TAKE FURTHER NOTICE** THAT ANY RESPONSES OR OBJECTIONS TO THE **MOTION FOR RELIEF OF STAY** MUST BE MADE IN WRITING, FILED WITH THE CLERK OF THE BANKRUPTCY COURT, AND SERVED UPON THE UNDERSIGNED PROPOSED COUNSEL TO THE DEBTOR AND ANY OTHER NOTICE PARTY, SO AS TO ACTUALLY BE RECEIVED BY OR BEFORE **APRIL 25, 2025 AT 4:00 P.M. (ET)**.

**PLEASE TAKE FURTHER NOTICE** THAT A HEARING ON THE FOREGOING **MOTION** SHALL BE HELD ON **MAY 6, 2025 AT 11:30 A.M. (ET)**, BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, AT 824 MARKET STREET, 6TH FLOOR, COURTROOM NO. 6, WILMINGTON, DE 19801.

**IF NO OBJECTION OR RESPONSE TO THE ABOVE-REFRENCED MOTION IS TIMELY FILED, SERVED AND RECEIVED, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: April 11, 2025

**McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP**

/s/Gaston Loomis, Esq.

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*Attorney for Jonathan Ortiz Munoz and Hannah Shalom  
Moody*